



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**URGENT MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

February 23, 2016

Ms. Barbara Ray, Coordinator, Hazardous Materials and Chemical Waste Public Safety  
University of Rhode Island - Kingston Campus  
53 Flagg Road  
South Kingstown, RI 02881

RE: NOTICE OF VIOLATION of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and State of Rhode Island and Providence Plantations Rules and Regulations for Hazardous Waste Management (Rhode Island Rules).

Dear Ms. Ray:

On May 11, 2015, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of University of Rhode Island - Kingston Campus, EPA ID No. RID075705780, with RI Rules 1.00-17.00 and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Rhode Island has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of RI Rules 1.00-17.00 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

1. Failure to make adequate waste determinations on aerosol cans in Automotive Garage and silver stain waste in laboratory;
2. Failure to separate possible incompatible wastes in CBLS Bldg. Labs (sodium hydroxide/ hydrochloric acid, and, sodium hydroxide/ acetic acid);
3. Failure to maintain hazardous waste containers closed on HPLC waste collection bottles in labs;
4. Failure to manage hazardous waste in a manner to minimize the potential for a release observed when overfilling a container of hazardous waste into its secondary container in College of Pharmacy - Lab 410;
5. Failure to appropriately label containers of hazardous waste in laboratories (smudged/hard-to-read labels);
6. Failure to properly mark hazardous waste lamps in "Lightbulb Shed" (marking of used lamps, dates);

7. Failure to mark check-off boxes on hazardous waste labels with words describing hazard in laboratories;
8. Failure to provide adequate training for laboratory personnel including Rebecca Levine; and,
9. Failure to maintain Contingency Plan for emergency coordinator changes.

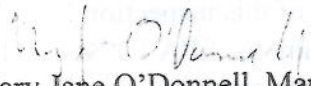
**University of Rhode Island - Kingston Campus must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.**

**Within (30) thirty calendar days of receipt of this NOTICE, submit a written description, with supporting documentation, of the actions taken to address requirements number through number above. Submit the information to:**

Donald MacLeod, Environmental Engineer  
U.S. Environmental Protection Agency  
Office of Environmental Stewardship (OES05-4)  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. If you have any questions regarding this NOTICE, please contact Donald MacLeod, of my staff, at 617-918-1405.

Sincerely,

  
Mary Jane O'Donnell, Manager  
RCRA, EPCRA and Federal Facilities

cc: Sean Carney, RIDEM  
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